

Sultz & Lipari

July 17, 2024

Via ECF

Magistrate Judge Anne Y. Shields, U.S.M.J.
United States District Court for the
Eastern District of New York
100 Federal Plaza
Central Islip, New York 11722

Re: *Franklin v. General Mills Inc.*, Docket No. 2:21-cv-01781-JMA-AYS

Dear Judge Shields:

We, along with our co-counsel represent Plaintiffs Shelby Franklin and Gabrielle Stuve in this matter. We write, with consent of Defendants, to request a brief two-week extension of the time for Plaintiffs to file their Third Amended Complaint.

On May 16, 2024, the Court granted Plaintiffs' request, on consent, to file a Third Amended Complaint on or before July 17, 2024. While Plaintiffs' counsel has worked diligently to meet this deadline, Plaintiffs require additional time to amend the complaint to address the arguments set forth in Defendants' motion to dismiss the Second Amended Complaint regarding the sufficiency of Plaintiffs' pleading pertaining to Article III standing.

Accordingly, Plaintiffs request leave to file their Third Amended Complaint on or before July 31, 2024. We have consulted with Defendants' counsel and they consent to this request (Defendants reserve all rights as to dismissal arguments as to the forthcoming amendment). The parties propose that after the Third Amended Complaint is filed, they will confer and submit a proposed briefing schedule for the Court's consideration.

We thank the Court for its attention to this matter.

Very truly yours,

SULTZER & LIPARI, PLLC



Jason Sultzer